


<b>COMPLIANCE</b>	 From DentaQuest			
	<i>Policy and Procedure</i>			
	Policy Name:	<b>Availability of the Code of Conduct Standards</b>	Policy ID:	<b>PLANCG-70</b>
	Approved By:	Courtney Ransom, Head of Risk Management, Ethics & Compliance	Last Revision Date:	02/03/2026
	States:	Oregon	Last Review Date:	03/25/2026
Application:	Medicaid	Effective Date:	03/26/2026	

**PURPOSE**

Advantage Dental Services is a wholly owned subsidiary of Sun Life Financial, Inc. and has adopted the Sun Life Code of Conduct, attached to this policy as Exhibit A.

This policy outlines the process to ensure that Advantage Dental Services Personnel, which includes, officers, employees, independent contractors, Board members and subcontractors (downstream entities), and other interested parties are aware of the required conduct as detailed in the Code of Conduct (“Code of Conduct”) and sets forth the policy and procedure for Code of Conduct distribution. The policy does not replace existing policy and procedure but rather serves as a reference guide for all Personnel to understand where to go to find the Code of Conduct to fully understand their compliance obligations.

The Standards of Conduct, detailed in the Code of Conduct, is the vehicle for establishing general principles that guide Advantage Dental Services operations. Compliance with the Code of Conduct is required by all Advantage Dental Services Personnel.

**POLICY**

Advantage Dental Services is committed to full compliance with all statutes, regulations, and guidelines applicable to commercial, federal, state, health plan programs and employment law. The Code of Conduct guides the organization’s actions, decisions, and operations by describing the standards to behave in an ethical manner. Advantage Dental Services will make the Code of Conduct available to all Personnel through various avenues.

**REFERENCES**

- CMS Managed Care Manual Chapter 21
- CMS Prescription Drug Benefit Manual Chapter 9
- 42 C.F.R. §§ 422.503 (b)(4)(vi)(A), 423.504 (b)(4)(vi)(A)
- 42 C.F.R. § 438.608(a)(1)(i)
- Applicable State Laws

**DEFINITIONS**

- **“Advantage Dental Services”** includes Advantage Dental Services, LLC and all of its subsidiaries and affiliates in the Advantage Dental Services organization.
- **“Personnel”** includes any officers, employees, independent contractors, Board of Director members and subcontractors (downstream entities) and any other interested party of Advantage Dental Services.

## PROCEDURE

- A. The Code of Conduct sets out responsibilities of all Advantage Dental Services Personnel. The Code of Conduct will be made available to Advantage Dental Services Personnel in the following ways:
1. The Code of Conduct is posted and available on the Intranet for all employees to review and download.
  2. The Code of Conduct will be reviewed, revised if necessary, and adopted by the Corporate Compliance Committee and the Quality & Compliance Committee of the Board annually.
  3. On an annual basis, subcontractors and providers will be provided with a copy of the Code of Conduct and will be required to attest to either having comparable documentation or complying with the Advantage Dental Services Code of Conduct.
- B. All Advantage Dental Services Personnel are required to complete a mandatory Code of Conduct training and declaration.
- C. Failure to comply with the Code of Conduct Standards, including other policies and procedures, may subject Personnel to disciplinary action, up to and including termination.

## EXHIBITS

### Exhibit A – Sun Life Code of Conduct

#### *Revision History*

Date:	Description
2/20/2015	Updates driven by the recommendations from the 2014 Compliance Program Assessment.
3/8/2016	Added “Ethics” to the description of the policy.
4/27/2017	Updates based on annual review.
2/27/2018	Conversion to revised policy and procedure format and naming convention.
11/12/2018	Corporate Compliance Committee approval
11/10/2020	ADS Compliance Committee approval
10/05/2021	Updates based on annual review.
12/31/2022	Updates based on annual review.
10/18/2023	Updates based on annual review.
10/15/2024	Annual review, no updates.
02/03/2026	Updates based on annual review.

**EXHIBIT A**

Code of Conduct  
Attached Separately